

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

**TAMICA N. ANDERSON, *on behalf of herself*
*And all similarly situated individuals, et al.***

Plaintiffs,

v.

Civil Action No. 3:11-cv-00604-JRS

PORTFOLIO RECOVERY ASSOCIATES, LLC.,

**PLAINTIFFS' MEMORANUM IN SUPPORT OF CONSENT MOTION FOR
EXTENSION OF TIME TO FILE THEIR BRIEF IN OPPOSITION TO
DEFENDANT'S MOTION JUDGMENT ON THE PLEADINGS**

Plaintiffs, by counsel, in support of their Motion for Extension of Time to File their Brief in Opposition to Defendant's Motion to Dismiss Complaint, states as follows:

1. A Class Action Complaint was filed on behalf on the Plaintiffs' on September 15, 2011.
2. Defendant filed its Motion for Judgment on the Pleadings on July 2, 2012;
3. Plaintiffs' Response is due on July 16, 2012;
4. Plaintiffs have sought and obtained the consent of the Defendant in seeking the extension of time of one week, making the opposition due on July 23, 2012. Plaintiffs have agreed to extend the time for the Defendant to reply until August 6, 2012.
5. The time in which the Plaintiff has to respond has not yet expired, thus the court may grant the extension pursuant to Fed. R. Civ. P. 6(b)(A).
6. The extension is not sought for a dilatory purpose and neither party will be prejudiced by a one-week extension.

Respectfully submitted,

TAMICA N. ANDERSON, *on behalf of herself*
And all similarly situated individuals, et al.

/s/

Leonard A. Bennett, Esq.
VSB #37523
Attorney for Plaintiff
CONSUMER LITIGATION ASSOCIATES, P.C.
763 J. Clyde Morris Boulevard, Suite 1-A
Newport News, Virginia 23601
(757) 930-3660 - Telephone
(757) 930-3662 – Facsimile
E-mail: lenbennett@cox.net

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of July, 2012, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

David Neal Anthony
Troutman Sanders LLP
Troutman Sanders Bldg
1001 Haxall Point
PO Box 1122
Richmond, VA 23219
Email: david.anthony@troutmansanders.com

Alan Durrum Wingfield
Troutman Sanders LLP
Troutman Sanders Bldg
1001 Haxall Point
PO Box 1122
Richmond, VA 23219
Email: alan.wingfield@troutmansanders.com

Jimmy Frank Robinson, Jr.
Troutman Sanders LLP
Troutman Sanders Bldg

1001 Haxall Point
PO Box 1122
Richmond, VA 23219
Email: jimmy.robinson@troutmansanders.com

/s/
Leonard A. Bennett, Esq.
VSB #37523
Attorney for Plaintiff
CONSUMER LITIGATION ASSOCIATES, P.C.
763 J. Clyde Morris Boulevard, Suite 1-A
Newport News, Virginia 23601
(757) 930-3660 - Telephone
(757) 930-3662 – Facsimile
E-mail: lenbennett@cox.net